

# **EXHIBIT E**

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

JASON WILLIAMS,  
Plaintiff,

CERTIFIED COPY

vs.

Case No. 5:19-cv-00475-BO

AT&T MOBILITY, LLC,  
Defendant.

CONFIDENTIAL  
DEPOSITION OF RAY HILL  
30(b)(6)

November 17, 2021

Page 1 - 301                      9:02 a.m. - 6:48 p.m. EST

REMOTELY REPORTED VIA VIDEO CONFERENCING

REPORTED BY:  
Tamara L. Houston  
CA CSR No. 7244, RPR, CCRR No. 140  
FILE NO. 21-105383

CONFIDENTIAL TRANSCRIPT

1 Q. Who else was present during that  
2 conversation --

3 A. No one.

4 Q. -- other than you, Ms. Okcu, and  
09:32:20 5 Mr. Breslin?

6 A. No one.

7 Q. Did you review any documents in preparation  
8 for today's deposition?

9 A. There was a printout of the account notes.

09:32:48 10 Q. Did you review anything other than the  
11 printout of the account notes?

12 A. There was a policy.

13 Q. Do you remember what the policy was?

14 A. I think there was a -- it was called "SIM  
09:33:12 15 Knowledge" -- "SIM Knowledge Center."

16 Q. Okay. So other than Mr. Williams's account  
17 notes, the SIM knowledge center policy, did you  
18 review any other documents in preparation for today?

19 A. There was two other policies around  
09:33:37 20 authentication, one that was call center and one that  
21 was retail.

22 Q. So a call center authentication policy and  
23 a retail center authentication policy?

24 A. Yes.

09:34:01 25 Q. Anything else other than -- any other

CONFIDENTIAL TRANSCRIPT

1 BY MR. LAVIGNE:

2 Q. Had you seen Mr. Williams's account notes  
3 prior to preparing for your deposition today?

4 A. Not that I recall.

09:39:13 5 Q. All right. Mr. Hill, I'm going to --  
6 and -- well, one -- one other question.

7 Were those account notes provided to you by  
8 AT&T?

9 A. Yes.

09:39:28 10 Q. Were they provided to you by AT&T's  
11 attorneys, Ms. Okcu or Mr. Breslin?

12 A. Yes.

13 Q. I'll ask you a little bit about background  
14 briefly.

09:39:45 15 Starting with your education, would you  
16 tell me where you attended -- what college or  
17 university you attended.

18 A. Wright State University and University of  
19 Phoenix.

09:40:05 20 Q. Rice State?

21 A. W-R-I-G-H-T, Wright State.

22 Q. And the University of Phoenix.

23 And let's start with the first one, Wright  
24 State. When did you -- what were the dates of your  
09:40:19 25 attendance?

1 he did not authorize the SIM swap from the day  
2 before, that caller from November 6th.

14:31:23 3 Q. All right. Do you know if anybody checked  
4 to determine whether the customer was telling the  
5 truth that he didn't authorize the SIM swap the day  
6 before?

14:31:39 7 A. Based on the account note that we're seeing  
8 here, we can see that the global fraud rep is saying  
9 that there's no usage on the SIM and so they  
10 suspended the service and deemed it hijack crime.  
11 And that was their determination.

12 Q. Do you have any information about the SIM  
13 swaps at issue in this case that come from anything  
14 other than these account notes?

14:32:16 15 A. No.

16 Q. Who does?

17 A. What do you mean?

18 Q. Who -- who would have information about the  
19 SIM swaps at issue in this case that comes from  
14:32:34 20 something other than these account notes?

21 MR. BRESLIN: Form. Calls for speculation.

22 You can answer, Ray.

14:32:49 23 THE WITNESS: I'm -- I'm just kind of,  
24 like, misunderstanding, I think. Are you asking,  
25 like, is there other data on a database? Or are you

1 asking -- I'm just not understanding what -- what  
2 you're asking.

3 BY MR. LAVIGNE:

4 Q. I'm asking who -- who investigated this --  
14:32:59 5 these account hijacks or account takeovers or  
6 unauthorized SIM swaps on Mr. Williams's account?  
7 Because you just said that you didn't -- you don't  
8 know anything about it other than reading these  
9 notes.

14:33:14 10 A. I understand that.

11 Q. Yeah.

12 A. Yeah, so -- so the asset protection  
13 investigator, if -- if they wanted -- I don't recall  
14 which -- which case, which investigator, but  
14:33:30 15 holistically, when we had that review between Niki  
16 and Rob Arno, they gave us a review --

17 MR. BRESLIN: Let's not -- let's not talk  
18 about what -- what was said there, but I think -- I  
19 think it's -- it's clear what he's getting at.

14:33:43 20 BY MR. LAVIGNE:

21 Q. Yeah. So I think your answer is you  
22 don't -- correct me if I'm wrong, but what I'm  
23 hearing is you don't necessarily know but possibly  
24 Robert Arno?

14:33:56 25 A. Robert Arno or -- or another AP

1 investigator.

2 Q. Understood.

3 These account notes refer to -- on  
4 November 6th at 11:25:29, they refer to case number  
14:34:16 5 2018-11-06/4362.

6 What does that refer to?

7 A. That looks like an intake number. The --  
8 the dash between the -- after the 06 -- I shouldn't  
9 say "dash." The backslash after the 06, I -- I  
14:34:32 10 cannot tell if that's something from the global  
11 fraud's case management or if that's something that  
12 they referred for an intake with asset protection.  
13 So I don't know which of the two it is.

14 Q. In your understanding, how -- how are  
14:34:52 15 fraud -- well, just to back up even more elementary  
16 step.

17 It appears, based on what you just said and  
18 based on these account notes, that the account notes  
19 we're reviewing on the screen right now, which are on  
14:35:05 20 November 6, 2018, at 11:25:29, and 11:19:00, they're  
21 based on a phone call received from Jason Williams;  
22 is that right?

23 A. Yes. That's a phone call from somebody  
24 saying they are Jason Williams.

14:35:25 25 Q. So if Jason Williams, a customer, calls in